

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Berkeley County School Board of Trustees,	)	Civil Action No.: 2:18-cv-00151-DCN
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
HUB International Limited, HUB International	)	<b>DEFENDANT SCOTT POKORNEY'S</b>
Midwest Limited, Hub International Southeast,	)	<b>RESPONSE AND CONSENT TO HUB</b>
Knauff Insurance Agency, Inc., Stanley J.	)	<b>DEFENDANTS' MOTION TO STAY</b>
Pokorney, Scott Pokorney, and Brantley	)	<b>DISCOVERY</b>
Thomas,	)	
	)	
Defendants	)	
	)	

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Defendant Scott Pokorney, by and through his undersigned counsel, hereby files this Response and Consent to the Motion to Stay Discovery (ECF Doc. No. 19) filed by Defendants HUB International Limited and HUB International Midwest Limited (“HUB Defendants”) and incorporates the arguments made therein. For the reasons set forth in the HUB Defendants’ Motion and Memorandum in Support, Defendant Scott Pokorney respectfully requests that the Court enter an order staying discovery and the Rule 26(f) conference in this matter pending resolution of any motions to dismiss to be filed by Defendants on March 20, 2018.

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February 26, 2018  
Charleston, South Carolina

ATTORNEY FOR DEFENDANT SCOTT  
POKORNEY